

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

UNITED STATES OF AMERICA)
)
v.) Criminal No.: 4:18-cr-00011
)
JAQUAN LAMONT TRENT)
a/k/a "Hatch")

STATEMENT OF FACTS

The parties stipulate that the allegations contained in the First Superseding Indictment and the following facts are true and correct, and that, had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt. JAQUAN LAMONT TRENT admits that this statement of facts does not include all facts known to him regarding the events charged in the First Superseding Indictment.

At all times relevant to the First Superseding Indictment, JAQUAN LAMONT TRENT a/k/a "Hatch" was an associate of the criminal organization, the Rollin 60s Crips ("Rollin 60s"), which is a criminal street gang. Since at least sometime in or about 2015, the Rollin 60s have been active in the Western District of Virginia and have engaged in criminal activity, including but not limited to murder and attempted murder, assault resulting in bodily injury, assault with a dangerous weapon, robbery, obstruction of justice, drug trafficking, trafficking in firearms, and conspiracy to commit those crimes.

The Rollin 60s, including its leadership, membership, and associates, constitutes an "enterprise" as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated-in-fact. The enterprise constitutes an ongoing organization whose members function as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise has engaged in, and its activities have affected, interstate and foreign commerce.

The purposes of the enterprise include: promoting and enhancing the enterprise, and enriching its members and associates through, among other things, acts of violence, including murder, trafficking in firearms, and trafficking in controlled substances, and the enforcement of discipline among the members; providing assistance to members of the enterprise who committed crimes for and on behalf of the enterprise; and thwarting efforts of law enforcement to apprehend enterprise members.

Defendant's Initials: LS

At all relevant times, TRENT was an associate of the Rollin 60s and was often called "Hatch." TRENT was involved in attempted murders committed on behalf of the enterprise, as well as gun and drug trafficking committed on behalf of the enterprise.

From within or about sometime in 2015, in the Western District of Virginia and elsewhere, TRENT and others, being persons employed by and associated with the Rollin 60s, an enterprise which was engaged in, and the activities of which affected interstate and foreign commerce, knowingly and intentionally did combine, conspire, confederate and agree with each other, and with persons known and unknown, to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving:

- a. Murder, chargeable under Virginia Code, Sections 18.2-32, 18.2-22, 18.2-26 and 18.2-18 and the common law of Virginia;

and multiple offenses involving:

- b. Trafficking in controlled substances in violation of 21 U.S.C. §§ 841 and 846.

In furtherance of the conspiracy and to achieve its objectives, TRENT performed and caused to be performed certain racketeering activity in the Western District of Virginia and elsewhere. The racketeering activity performed by TRENT included, but is not limited to:

A. Association with Rollin 60s Crips

TRENT is a brother of Deshaun Trent (a/k/a "DaDa" or "Six") and a cousin of Kevin Trent, Jr. (a/k/a "Benji" or "Gates" or "6owie" or "Bad Ass") and Kanas Trent (a/k/a "LA"). Deshaun Trent, Kevin Trent, Jr., and Kanas Trent are all members of the Rollin 60s. At all times relevant to the First Superseding Indictment, the head of the Rollin 60s was Marcus Davis (a/k/a "Sticcs"). At all times relevant to the First Superseding Indictment, other members of the Rollin 60s included Phillip Miles (a/k/a "R"), Shabba Chandler (a/k/a "Trill"), Matthew Ferguson (a/k/a "MC"), Laquante Adams (a/k/a "Spazz"), Wyshawn Brandon (a/k/a "Mr. Man"), and Stevie Johnson, Jr. (a/k/a "No Good"), among others. Ashley Ross was the girlfriend of Miles and is the mother of one of his children. At some point in 2016, Ross lived at Southwyck Apartments, which is known as North Hills Court. Southwyck Apartments is located in Danville, Virginia. At Ross's apartment, TRENT and members of the Rollin 60s would hang out at Ross's apartment.

At some time in 2015, TRENT legally purchased a .45 caliber Glock firearm. TRENT knowingly has loaned this firearm to Dashaun Trent to use on different occasions, and has seen Dashaun Trent, Kevin Trent, Jr., Kanas Trent, Miles, Chandler, Ferguson, and Adams carrying

Defendant's Initials: LJK

firearms. In 2016, Miles asked TRENT to purchase a firearm for Miles, which TRENT declined to do. Johnson has also asked TRENT to purchase a firearm for him.

In 2016, TRENT lived with Deshaun Trent and Tredarius Keene (a/k/a “Bubba”) at an apartment on Parker Road in Danville. Keene is a member of the Milla Bloods street gang. Keene stored firearms at the Parker Road apartment. Keene, Deshaun Trent, and Miles frequently hung out together.

TRENT grew up in the “800” neighborhood of Danville, Virginia, which is an area just south and east of Green Street and which encompasses Colquhoun, Lee, Paxton, and Cabell Streets as well as Berryman Avenue. The “800” neighborhood is known as the territory of the Rollin 60s. Members of the Rollin 60s kept a “trap house” on Lee Street.¹ Members of the Rollin 60s would hang out at this house, have gang meetings, and different gang members lived there from time-to-time. Danville, Virginia is located in the Western District of Virginia.

B. Conspiracy to Murder Ekong Eshiat (December 2015)

Robert “Jay” Kennedy is from the 800 neighborhood. In 2015, Kennedy was shot. Based on the statements of a witness, individuals believed Kennedy had been shot by a member of the rival Billys Bloods street gang named Ekong Eshait. Shortly after the shooting, TRENT was at the Rollin 60s’s trap house on Lee Street, smoking marijuana and hanging out. While he was there, TRENT heard Dashaun Trent and others discuss retaliating against the rival gang member by shooting him, and observed Deshaun Trent, Miles, Ferguson, Keene, and others whom TRENT cannot remember arm themselves with firearms in order to do so. TRENT left the trap house. This incident and the retaliatory shootings that occurred afterwards appeared to spark and escalate a gang war between the Rollin 60s and Billys.

C. Attempted Murder of Dwight Harris and Armonti Womack (June 15, 2016)

On or about June 15, 2016, TRENT was at his apartment on Parker Road, hanging out with Tyson Bowens (a/k/a “Ty Savage”), Deshaun Trent, Wydshawn Brandon (a/k/a “Mr. Man”), and Miles. At some point that night, Miles received a telephone call. Miles then informed the group that Kevin Trent, Jr. was in an argument at North Hills Court with two individuals known as the “Philly Boys.” In response, Bowens, Dashaun Trent, Brandon, Miles, and TRENT traveled to North Hills Court in Miles’s black Impala. Bowens drove the vehicle. TRENT sat in the backseat between Miles and Brandon, with Deshaun Trent in the front passenger’s seat. Deshaun Trent, Brandon, Miles, and TRENT were armed. TRENT carried a semi-automatic rifle that had been in the Parker Road apartment on the couch. The others carried pistols.

¹ The term “trap house” generally describes, as in the instant case, a house used by gang members to hang out, conduct gang business, and traffic in drugs and firearms.

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When the group arrived at North Hills Court, they stopped at the entrance of the apartment complex, where they met six to seven other black males. TRENT only recognized an individual nicknamed "Shon Don," who was the Big Homie of the Milla Bloods. TRENT tied a t-shirt around his face to disguise his identity and saw other individuals partially cover their faces with red bandanas, blue bandanas, and black t-shirts. Some individuals wore hoodies to help disguise themselves. The group planned to walk into the North Hills Court apartment complex and shoot and kill the Philly Boys.

From the area near the entrance to North Hills Court, TRENT and the group walked into the apartment complex, disguised and armed. The group walked towards the building where Ashley Ross lived. As TRENT walked forward, he saw Kevin Trent, Jr. and Tanasia Coleman (a/k/a "Nasia") near two cars and two individuals, believed to be the "Philly Boys." TRENT believes the first shots came from the area where Kevin Trent, Jr. was standing. At that point, TRENT began firing his rifle and heard others firing around him. During the shooting, TRENT fired his rifle until the 30-round clip was empty. TRENT saw Kevin Trent, Jr. and Deshaun Trent firing their weapons. He did not see a weapon in Coleman's hands.

TRENT ran back towards Miles's black Impala, where Bowens was waiting. Deshaun Trent, Miles, Bowen, Brandon, and TRENT returned to TRENT's apartment on Parker Road. At some point, Ross, Coleman, and Keene arrived. Coleman's hand had been injured in the shooting. Keene stated that, during the shooting, he was in Ross's apartment, that he was firing from Ross's living room window, and that he hit one of the Philly Boys. Miles collected the firearms in order to dispose of them to avoid detection by law enforcement.

The shooting improved the reputation of the Rollin 60s Crips around Danville, as the gang seemed violent. TRENT recalls that, during this time, everyone wanted to be a Rollin 60s Crips and started wearing blue bandanas.

D. Conspiracy to Distribute Controlled Substances

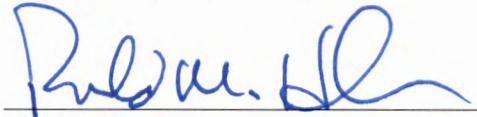
During and in furtherance of the conspiracy, TRENT conspired with others to distribute, and did in fact distribute, marijuana on behalf of the racketeering enterprise. Specifically, Deshaun Trent and others sold marijuana to TRENT. TRENT has also seen Deshaun Trent, Kevin Trent, and Kanas Trent sell marijuana to others.

Each of the acts set forth in paragraphs A, B, C, and D above furthered the goals and objectives of the enterprise by enriching TRENT and its members and associates, and enhancing the status of TRENT and others within the organization.

Defendant's Initials: UT

The actions taken by TRENT as described above were taken willfully, knowingly, and with the specific intent to violate the law. TRENT did not take those actions by accident, mistake, or with the belief that they did not violate the law. TRENT acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

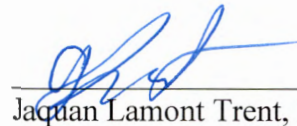
Respectfully submitted,



Heather L. Carlton
Ronald M. Huber
Assistant United States Attorneys

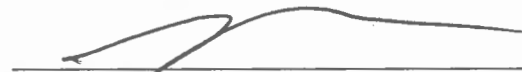
Michael J. Newman
Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Jaquan Lamont Trent, Defendant

I am Jaquan Lamont Trent's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



P. Scott DeBruin
Counsel for Defendant

Defendant's Initials: JK